

From:

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A member of the LPAM group of the Yahoo Online Groups.

Comments On: The LPAM Rule Making Petition dated August 19, 2005

In reading the LPAM Rule Making Petition dated August 19, 2005 as submitted by DON SCHELLHARDT, ESQUIRE Liberal Studies Program, Hollins University P.O. Box 9536 Roanoke, VA 24020 on behalf of 5 parties. I have noticed things I do think are feasible in that petition and, on the other hand, things that I feel are not feasible and unrealistic.

Actually it creates a tiered system based upon population density and distance from the local populations in an attempt to create numerous classes of transmitter powers in one service. In an attempt to have a service with increasing transmitter power levels with distance from metropolitan areas. From 5 watts to 250 watts. From the engineering perspective on the business end of the idea. This would create all sort of oversight departments and data bases and the need for the FCC to commission new softwares to run the administrative end of the ideas of that petition. In effect, un economical.

So it fails and not only on this point but also on others and the fact that not all parties to the petition stood in agreement on it all the way through. Some decide to later offer alternate proposal points. And actually in reading the petition it was somewhat a bunch of nonsense in my opinion. It created overly complicate areas within the proposed LPAM Service and this means it is not feasible economically on the FCC end. To much administrative over site was being engineered into that plan and that would have made the LPAM Service more of a problem and nightmare than an economical and profitable sideline at the FCC end.

It lacked a true engineering view. Engineers have not only to deal with the vision of their technology they design but the manufacturing and business end of their technology. Which they have to also design into the overall engineering scheme. So we have to look at the administrative business end of the FCC also, in our views as we proceed. And streamline the LPAM Service for them. And so not make it a head ache on the FCC's part.

Here is another engineering nightmare that I saw in that proposal. The August 19, 2005 Rule Making Petition suggested that in the band segment of 1600 to 1710 kHz that the channel spacings be

changed to 5 kHz for some power class stations to allow more stations on that segment of the Mediumwave Band. And this is infeasible from both the adjacent channel interference point of view and from modern technology perspectives in that many people use a modern digitally tuned Mediumwave Receiver that tunes only in 10 kHz steps. Hence the long term viability of the service would not be served. And we would end up in an era called the Mediumwave wars.

The creation of the LPAM service is not going to have a million people run into it over night and thus rush to the LPAM market place. Only those people with an interest and feel for radio will ponder and consider it. There are some things about the know how of radio that they have to have. And those without that know how and interest are not going to be getting up on the airwaves. It takes one with a vision of a station and a format they want, who will be motivated to enter the service. The most likely interested parties are ham radio operators, seasoned CB radio operators and shortwave radio hobbyist who are perhaps the electronic hobbies sorts. And of course the wanna be DJ types.

Hence there is no need to consider altering the channel spacings that are already defined and one should leave well enough alone.

Now this is the clincher of the August 19, 2005 Rule Making Petition. You will read therein that the design of the service was to allow for as many as 12 licenses per applicant. Well on the surface this might seem ok. Then you notice words such as:

"2. LPAM broadcasters should have opportunities to own more than one station initially, and perhaps add others over time, potentially growing large enough to fill the current gap between small stations and mega corporations. This is the vacuum where mid-sized businesses used to be, in the days before mandatory license auctions and elevation of the legal ceilings on how much of the mass media a single institution may own."

"...In addition, the Baumgartner Petition (they are referring to a former petition) would not allow ownership of multiple stations in different localities. It would, therefore, bar *LPAM companies from any chance *to grow into mid-sized competitors of the current mega corporations. In fact, the Baumgartner Petition would actually splinter some LPAM stations through the automatic imposition of time-sharing among all mutually exclusive LPAM applicants.

The Petitioners propose allowing ownership of at least 12 stations nationwide, with a review of this limit after 3 years. However, *we would insure LPAM diversity at any particular location *by permitting only one station per owner in any given Metropolitan Statistical Area (MSA), any Metropolitan District thereof or any Micropolitan Area."

Now this sounds good on the surface. But watch what they were trying to engineer up here: "It would,

therefore, bar * LPAM companies from any chance to grow into "mid-sized competitors of the current mega corporations."

Mid sized competitors of mega corporations means a competitor of a much larger size than a small privately owned radio station. It spells out a corporation with affiliations, networks and franchises coming into the scheme in due of time. And contrary to their views that major corporations should not use this service they were setting themselves up to grow to become as they named themselves in the petition:

"...."THE LPAM NETWORK" is a national association of aspiring Low Power AM broadcasters, some of them already Part 15 AM operators, who have joined forces to engage in networking, information exchange and advocacy."

The words that give away the fact they had a plan to grow and to control is in the slip of the tongue at "...we" would insure LPAM diversity..." and at "...by permitting only one station per owner..." And so they are saying "We would control by permitting...etc."

The words "...to engage in networking, information exchange and advocacy.." are major media network terminology.

If you ask how that they can get around the anti corporation clause of their own petition?

Those of us who meet at the LPAM group of the Yahoo Online Groups. Study the feasibility and practicality of LPAM ideas. We are convinced that we have a better plan for a reasonable and feasible LPAM Service based upon a set carrier power level definition of 10 watts RMS carrier for use in Amplitude Modulation. And that this be the defined class of transmitter power for all applicants.

Such a definition then would not lead to the complications of long distance interference that high power levels would lead to. And the power level would not lead to allot of time sharing problems in most locations. And we are limiting our request for the number of licenses anyone may own to only 2 per applicant in our proposal we are pondering. Which again means that the numbers of stations that will be on the air are reduced down to 2 per applicant and not 12. Hence reducing further time sharing problems.

Hence in our idea we are using two points to reduce the time share problems, and by the use of low power being defined as 10 watts RMS carrier we are insuring the Service would not create undue interference on the levels that LPAM opponents magnify the notion of such a radio service would create.

Sincerely

Daniel Jackson